



California Regional Water Quality Control Board
Central Valley Region
Katherine Hart, Chair



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Acting Secretary for
Environmental Protection

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Edmund G. Brown Jr.
Governor

14 April 2011

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CIWQS Entry	Nov
ID No.	378739
Date	06/27/11
By	MR

NOTICE OF VIOLATION, REVIEW OF 2010 SECOND SEMIANNUAL AND ANNUAL MONITORING REPORT, YUBA-SUTTER DISPOSAL, INC. LANDFILL, YUBA COUNTY

The Central Valley Water Board staff has reviewed the 2010 Second Semiannual and Annual Monitoring Report for the Yuba-Sutter Disposal, Inc. Landfill. Post closure maintenance and corrective action monitoring of groundwater wells at the landfill site is regulated under Waste Discharge Requirements (WDRs) Order R5-2003-0093.

Area LF-1 and LF-2 reported volatile organic compounds (VOCs) in corrective action wells MW-1, MW-2, MW-3, MW-4, and MW-10 indicating that groundwater has been affected by an ongoing release from these units, which is a violation of WDRs R5-2003-0093. VOCs were not detected in LF-3 corrective action wells MW-8, MW-11, or MW-12. Concentration limits for bicarbonate and total dissolved solids (TDS) were exceeded in wells MW-1, MW-2, MW-8, MW-11, and MW-12. Chloride also exceeded concentration limits in wells MW-1 and MW-2.

According to the Annual Report, the Discharger installed 15 landfill gas (LFG) extraction wells in LF-3 during the first half 2010 and they became operational in July 2010. The new extraction wells and four existing leachate sumps were connected and made part of the active LFG system and flare. VOCs and other exceedences of constituents of concern in groundwater could be a result of migrating LFG. Results for this system have not been submitted for review. The WDRs and the Monitoring and Reporting Program (MRP) R5-2003-0093 do not describe the LFG system nor do they provide monitoring parameters or schedule of reporting for this activity. Staff does not consider the newly installed extraction wells part of corrective action since this system was installed to comply with AB32 and Cal Recycle regulations. However, to complete our files, please submit a LFG extraction well installation report by **29 April 2011**.

Staff also is concerned about the groundwater monitoring system associated with the landfill site. Based on the hydrographs presented in Appendix A, wells MW-1 through MW-10, and MW-13 have well screens set below measured groundwater elevations. The concern of staff is whether the wells are properly installed to detect a release from the waste management units (VMUs) and whether groundwater samples are representative of first encountered groundwater quality.

CIWQS VID #893146

California Environmental Protection Agency

The monitoring report provides no explanation as to why groundwater elevations are consistently measured above the top of screen intervals, and why the groundwater monitoring wells installed in 2001 were not screened appropriately across the water table.

40 CFR, Part 258, Subpart E., states in part: *Proper selection of the vertical sampling interval is necessary to ensure that the monitoring system is capable of detecting a release from the MSWLF unit.* In accordance with Title 27, §20415(e)(1) General Monitoring Requirements: *All monitoring systems shall be designed and certified by a registered geologist or a registered civil engineer.*

By **31 July 2011**, the Discharger shall submit with the first semi-annual groundwater monitoring report an evaluation of the all background, detection, and corrective action monitoring wells certifying the monitoring systems meet the intent of 40 CFR, Part 258, Subpart E and Title 27, §20415. The evaluation should include a review of well logs, a review of well construction details and whether the length and vertical position of the well screens are appropriate to monitor first encountered groundwater. This evaluation should also provide cross sections of the landfill site and the underlying geology and explain why these wells meet the intent of Title 27. The report shall be certified by the appropriate professional. Furthermore, the Discharger shall provide a summary of the effectiveness of corrective action measures of LF-1 and LF-2, and whether additional corrective action is required to eliminate detected VOCs in groundwater.

Please call me at 916-464-4740 or Todd Del Frate at 916-464-4737 if you have any questions.



ANNE L. OLSON, P.E.
Senior Water Resources Control Engineer
Compliance and Enforcement Unit

Enclosure(s) Monitoring and Reporting Checklist

cc: Deborah Biersteker, Yuba County Environmental Health Department
 Kris Johnson, Golder Associates, Inc., Sunnyvale, CA

CALIFORNIA REGIONAL WATER QUALITY CONTROL BOARD

MONITORING REPORT COMPLIANCE CHECKLIST FOR

WASTE DISCHARGE REQUIREMENTS FOR

DISCHARGES REGULATED BY TITLE 27 AND/OR SUBTITLE D PART 258

Discharger(s): Recology	Reporting Frequency: Semi-annual
Facility Name: Yuba Sutter Disposal, Inc. Landfill	Monitoring Period: 2010 Second Semester and Annual
Order No.: R5-2003-0093	
Standard Provisions Date: 2003	Date Due: 31 January 2011
Facility No.: 5A580300001	Date Received: 31 January 2011
RWQCB Reviewer: Todd Del Frate	Date Reviewed: 2 March 2011

Reference	Parameter	Yes	No	N/A	RWQCB Reviewer Comment
Standard Provisions (1993,1997,2000, 2003)	1. Transmittal Letter	X			
	a. Is there a transmittal letter signed by an authorized representative?				
	b. Does it include the required Certification Statement?	X			
	c. Is there a discussion whether any violations have occurred since the last monitoring report was submitted?	X			LF-1 and LF-2 not achieving water quality standard in wells MW-1, MW-2, MW-3, MW-4, and MW-10. Inorganic constituents detected in wells MW-8, MW-11, and MW-12 above compliance limits. No VOCs detected in area LF-3
	d. If any violations did occur, does it describe actions taken or planned for correcting those violations?	X			Continued monitoring.
Standard Provisions (1993,1997,2000, 2003)	2. Compliance Evaluation Summary	X			
	a. Map/Photo: Is there a map or aerial photograph indicating the locations of all monitoring points?				
	b. Standard Observations: Is there a summary and certification of completion of all standard observations for the WMU, and for receiving waters?	X			

Sr. Initials AD CIWQS/Geotracker Entry _____

CIWQS VID #893146

Reference	Parameter	Yes	No	N/A	RWQCB Reviewer Comment
Standard Provisions (1993,1997,2000, 2003)	c. Lab Reports: Are all sample analyses conducted by a laboratory accredited by the State Department of Health Services?	X			
	d. Wastes: Is there a description of the quantities and types of wastes discharged and the locations in the WMU where waste has been placed since submission of the last monitoring report?			X	Landfill is closed.
WDRs/MRP/ Standard Provisions (1993,1997,2000, 2003)	Surface Water Monitoring	X			Surface water samples collected from SW-2, SW-3, and SW-4 on December 6, 2010. SW-5 was not sampled due to insufficient water.
	e. Are all surface water Field Parameters, Monitoring Parameters, and COCs (if required) sampled and analyzed?				
	f. Have any surface water concentration limits been exceeded? If yes, identify in comments.	X			TSS in sample SW-3 was reported over concentration limit.
	g. Run-off/Run-on: Is there an evaluation of the effectiveness of run-off/run-on control facilities?	X			
WDRs/MRP/ Standard Provisions (1993,1997,2000, 2003)	Leachate Monitoring	X			
	h. Are all leachate Field Parameters, Monitoring Parameters, and COCs (if required) sampled and analyzed?				
	i. Is there an evaluation of the effectiveness of leachate monitoring and control facilities?	X			Approximately 77,000 gallons of leachate was extracted from LF-3 sumps S-2 and S-4 during 3 rd and 4 th Quarters 2010.
WDRs/MRP	Vadose Zone Monitoring			X	
	j. Are all vadose zone Field Parameters, Monitoring Parameters, and COCs (if required) sampled and analyzed?				
	k. Have any vadose zone concentration limits been exceeded? If yes, identify in comments.			X	

Reference	Parameter	Yes	No	N/A	RWQCB Reviewer Comment
WDRs/MRP/ Standard Provisions (1993,1997,2000, 2003)	Groundwater Monitoring	X			Next COC event 4 th Quarter 2011.
	l. Are all groundwater Field Parameters Monitoring Parameter, and COCs (if required) sampled and analyzed?				
	m. Have any groundwater concentration limits been exceeded? If yes, identify in comments.	X			VOCs detected in corrective action wells from areas LF-1 and LF-2. Upward trends of chloride (MW-4), Nitrogen (MW-1, MW-2, MW-3 and MW-4), upward trend of sulfate (MW-3), upward trend of Acetone reported (MW-4, MW-8, MW-11, MW-12).
	n. Is there a description and graphical presentation of groundwater flow direction and gradient?	X			
	o. Monitoring Wells: Is there a description, method, and time of water level measurement and well recovery time?	X			
	p. Purging: Is there a description of the purging method, purge pump and its placement, and field parameters?	X			
WDRs Standard Provisions (1993,1997,2000, 2003)	Semiannual/Annual Monitoring Report (when applicable)	X			
	q. Are all monitoring parameters and COCs graphed so as to show historical trends at each Monitoring Point and Background Monitoring Point?				
	r. Is all monitoring analytical data obtained in the last year presented in tabular form, as well as on a diskette or CD?	X			
	s. Is there a comprehensive discussion of the compliance record and the result of any corrective actions?	X			Fifteen LFG extraction wells installed in LF-3 during 1 st half of 2010. Start up July 2010.

Reference	Parameter	Yes	No	N/A	RWQCB Reviewer Comment
	t. Is there a map showing the area and elevations in which filling has been completed during the past year and comparison to final closure contours?			X	Landfill is closed.
WDRs Standard Provisions (1993,1997,2000, 2003)	u. Is there a summary of the monitoring results indicating any changes made or observed since the previous annual report?	X			Report does not provide an in depth evaluation of Piper Diagrams. Corrective action wells enriched with bicarbonate are likely impacted by LFG.
	v. Is there an evaluation of the effectiveness of the leachate monitoring/control facilities?				
Standard Provisions (April 2000, Sept. 2003) or check WDRs	w. Is there a discussion about the annual LCRS testing and a comparison to earlier testing?				

Violations Noted? (check one) Yes X No _____

If Yes, check all issues that apply and provide comments:

<p> <input type="checkbox"/> Incomplete transmittal letter <input type="checkbox"/> Incomplete report <input type="checkbox"/> Inadequate monitoring program <input type="checkbox"/> New release <input type="checkbox"/> Inadequate response to evidence of a release <input checked="" type="checkbox"/> WDRs violation other than listed above <input type="checkbox"/> Other (explain in comments) </p>	<p><u>Comments (to be entered into CIWQS/Geotracker):</u> <u>VOCs detected in several corrective action monitoring wells adjacent to LF-1 and LF-2. Corrective action wells for LF-3 did not contain detectable VOCs. Staff has questions about hydrographs and will ask Discharger to evaluate and certify the detection and corrective action monitoring system per Title 27 Section 20415(e)(1).</u></p>
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Additional Comments and Recommendations:

2.M. 1,4-Dichlorobenzene detected in well MW-2 during August and December sampling events. Acetone detected in well MW-4 during December event. 1,4-Dichlorobenzene detected in MW-10 during August 2010 event. Multiple trace VOCs reported from wells MW-1, MW-2, MW-3. No VOCs detected in corrective action wells MW-8, MW-11, or MW-12.

RWQCB Staff Signature: _____

Date: _____